



August 8, 2012

Bryan Carter
Division of Water Pollution Control
JCFO
2305 Silverdale Rd
Johnson City, TN 37601

RECEIVED
AUG 10 2012
JOHNSON CITY ENVIRONMENTAL
FIELD OFFICE

Mr. Carter,

AGC Flat Glass North America, Inc. - Kingsport Plant, is providing the following information as per our NPDES permit # TN0003905- Part II, Section C (2) – Reporting of Noncompliance. This letter is intended to serve as our written submission of noncompliance issued within five days of an upset.

On 8/6/2012 at approximately 11:23 AM, I discovered a water discharge heading from our process water separation area out of the facility basement. The discharge flowed towards the onsite storm sewer ditch. Pursuant to the requirement of our NPDES permit, we reported the discharge within twenty-four (24) hours to the Johnson City Field Office of the Tennessee Department of Environment and Conservation Division of Water Pollution Control. Our designated facility Environmental Specialist Bryan Carter was not available, and our report prompted an onsite visit and investigation by TDEC Environmental Specialists Sandra K. Vance and Gregory K. Tester.

AGC conducted an internal investigation into the cause of the process water discharge. On Saturday, August 4, at approximately 8:00 AM a PVC process drain line collapsed. At the time, the manufacturing process had been down for a week and the drain line did not contain any liquids. The pipe was replaced with another like PVC pipe on Sunday, August 5. When the manufacturing process was started up on Monday, August 6, it was discovered that a crack at the junction of the replacement pipe and an old section of pipe allowed some process water to escape into the basement. Under normal operating conditions, this water is captured in the basement and sent via piping through the use of sump pumps to the facility settling ponds for discharge from Outfall 001, as allowed by the site's NPDES permit. On this morning, Monday, August 6, the sump pumps were overwhelmed by unusually heavy rain and some of the process water escaped out through an overhead door into a storm water drainage ditch.

The pH level at the discharge stream was 8.78. The pH is indicative of a small release of a process coolant called mirror grind (pH of 10.2-10.6- see attached MSDS) normally found in the process water in concentrations of 3 – 5%. Subsequent to the release, our records indicate that operators had to add 60 gallons of mirror grind to bring the concentration in the treatment system back to normal levels. Based on this addition, we would estimate that no more than 30 gallons of mirror grind material, diluted with process water and storm water, was discharged into the storm drainage ditch.

In order to help contain any future spills, storm drains are being re-routed away from the basement area. In addition, a new high capacity sump pump is being installed in the basement. It is anticipated this will be installed by Friday, August 10. Furthermore, per our conversations with Sandra K. Vance, and Gregory K. Tester, the facility storm drains will be cleaned of sediment that may inhibit the flow of storm water.

If you have any questions in regards to the reports, please contact me at (423) 765-8767.

Sincerely,
Sean Melville
EHS Manager-Kingsport Facility



MATERIAL SAFETY DATA SHEET



MSDS Name: MIRROR GRIND 5442

MSDS Number: PT0554-42

Version Number 0009

MSDS Date: 04/05/02

Page Number: 1 of 6

Portland, Oregon

800-554-4666

Orangeburg, S.C.

888-891-7765

SECTION I - PRODUCT AND COMPANY INFORMATION

Product Name: MIRROR GRIND 5442
CAS Number MIXTURE
Hazard Rating: Health: 1 Fire: 1 Reactivity: 0 PPI: E
EPA Registration NA

Company Identification: Associated Chemists, Inc.
4401 S.E. Johnson Creek Blvd.
Portland OR 97222

Contact: CUSTOMER SERVICE
Telephone/Fax: (503) 659-1708 (503) 653-0409
Emergency Phone (24 Hour): INFOTRAC
(800) 535-5053
Preparer: ROALD K. BERG, CHMM
ENVIRONMENTAL MGR.

Product Class LUBRICANT
Trade Name MIRROR GRIND 5442
Product Code PT0554-42

SECTION II - INGREDIENT AND HAZARD INFORMATION

Hazardous Ingredients	CAS Number	%	TSCA	Health	Fire	React	PP
TRIETHANOLAMINE	102-71-6	1 - 5	Y	2	1	0	H
MONOETHANOLAMINE	141-43-5	1 - 5	Y	3	2	0	H
BORIC ACID	10043-35-3	1 - 5	Y	1	0	0	E
SODIUM BORATE	1330-43-4	0.5 - 1.5	Y	1	0	0	E
4,4-DIMETHYLOXAZOLIDINE	51200-87-4	0.5 - 1.5	Y	3	2	0	E

*** ALL Ingredients in this product are listed in the T.S.C.A. Inventory

SECTION III - HAZARDS IDENTIFICATION

PRIMARY ROUTES OF ENTRY:

Ingestion, and/or inhalation of mists or sprays.

CARCINOGENICITY:

This product does not contain any substance(s) listed as a carcinogen by NTP, IARC, or OSHA.

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ACUTE (SHORT TERM) FOR PRODUCT:

EYES: Causes severe irritation.

SKIN: May cause irritation.

BREATHING: Inhalation of vapors or mists could cause pulmonary irritation, dizziness, and nausea.

SWALLOWING: Ingestion may cause nausea, vomiting, diarrhea.

CHRONIC (LONG TERM) FOR PRODUCT OR COMPONENTS:

Prolonged or repeated breathing of sprays, mists or dusts in excess of the suggested TLV may cause nasal and respiratory irritations.

SECTION IV - FIRST AID MEASURES

- IF IN EYES: Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician if irritation persists.
- IF ON SKIN: Remove contaminated clothing and wash affected skin area with soap and water.
- IF SWALLOWED: DO NOT INDUCE vomiting. Call a physician promptly. Give large quantities of water or milk. Never give anything orally to an unconscious or convulsing person.
- IF BREATHED: Remove person to fresh air. If not breathing, apply artificial respiration. If breathing is difficult, give oxygen. Contact a physician promptly.

SECTION V - FIRE-FIGHTING MEASURES

Flammability Class IIIB

Flash Range: >200

Setaflash

Explosive Range: Not Applicable

EXTINGUISHING MEDIA:

Water spray, dry chemical, chemical foam, or carbon dioxide.

SPECIAL FIREFIGHTING PROCEDURES:

Use self-contained breathing apparatus with full facepiece.

UNUSUAL FIRE & EXPLOSION HAZARDS:

Never use welding or cutting torch on or near drum, even empty, because product or residue can ignite potentially explosively.

SECTION VI - ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

SMALL SPILLS: Use an inert material (sawdust, kitty litter) or a cellulosic absorbent to absorb spilled product. Flush spill area with plenty of water.

LARGE SPILLS: Use caution; spilled material may be extremely slippery. Contain spilled material immediately and prevent from

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entering the sewer system. Use an appropriate absorbent to absorb spilled product. If available, use liquid vacuum to suction spill into appropriate containers for reuse or disposal.

SECTION VII - HANDLING AND STORAGE

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:

Containers of this material may be hazardous when emptied. Since emptied containers retain product residues (vapor, liquid, and/or solid) all hazard precautions given in this data sheet should be observed.

Store in cool dry area preferably at 70F.

SECTION VIII - EXPOSURE CONTROLS/PERSONAL PROTECTION

Occupational Exposure Limits

	ACGIH TLV	ACGIH TLV-C	ACGIH STEL	OSHA STEL	OSHA PEL
TRIETHANOLAMINE					
5.00 mg/M3	N/est	N/est	N/est	3.00 PPM	
MONOETHANOLAMINE					
3.00 PPM	N/est	6.00 PPM	6.00 PPM	3.00 PPM	
BORIC ACID					
10.00 mg/M3	N/est	N/est	N/est	15.00 mg/M3	
SODIUM BORATE					
1.00 mg/M3	N/est	6.00 PPM	N/est	5.00 mg/M3	
4,4-DIMETHYLOXAZOLIDINE					
N/est	N/est	N/est	N/est	N/est	

RESPIRATORY PROTECTION:

None normally required. However, if exposure to airborne concentrations exceeds occupational exposure limits listed in SECTION II, use an appropriate NIOSH-approved respirator for organic vapors and/or particulates in accordance with 29 CFR 1910.134.

VENTILATION:

Use adequate ventilation to keep airborne concentrations below the exposure standard.

PROTECTIVE GLOVES:

Neoprene rubber gloves are recommended.

EYE PROTECTION:

Wear approved splashproof chemical goggles.

OTHER PROTECTIVE EQUIPMENT:

None normally required.

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SECTION IX - PHYSICAL AND CHEMICAL PROPERTIES

Form: LIQUID
Appearance/Color: YELLOW
Odor: SLIGHT
Solubility (in water): MISCIBLE
pH Value: 10.2 - 10.6
Boiling Range: (WATER) 212.F (100.C)
Vapor Pressure (mmHg): (WATER) 17.@ 68.F (20.C)
Melting Point: Not Applicable
Evaporation Rate: Unavailable

Vapor Density: Non Volatile

Partition Coefficient Not Available
% Volatile Volume Not Available
Specific Gravity: 1.03759
VOC SEE SECTION XVI
Molecular Weight: MIXTURE

SECTION X - STABILITY AND REACTIVITY

Stability: This product is stable
Hazardous Polymerization: Hazardous polymerization will not occur

INCOMPATABILITY:

Acids, strong oxidizing agents.

CONDITIONS TO AVOID:

Acids, strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS

Carbon monoxide, carbon dioxide and/or oxides of nitrogen can be liberated at high temperatures.

SECTION XI - TOXICOLOGICAL INFORMATION

Lethal Dose Information (ppm)

TRIETHANOLAMINE

Oral	Rat, adult	LD50 7300. mg/kg
Skin	Rabbit, adult	LD50 2000. mg/kg

MONOETHANOLAMINE

Oral	Rat, adult	LD50 1720. mg/kg
Skin	Rabbit, adult	LD50 1000. mg/kg

BORIC ACID

Oral	Unknown	LD50 2660. PPM
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Skin Unknown LD50 2. PPM

SODIUM BORATE

Oral Unknown LD50 3400. PPM
Skin Unknown LD50 2000. PPM

ADDITIONAL TOXICOLOGICAL DATA FOR PRODUCT AND/OR INGREDIENTS:
None known for product.

SECTION XII - ECOLOGICAL INFORMATION

ECOLOGICAL INFORMATION FOR PRODUCT AND/OR INGREDIENTS:
No aquatic information available for product.

SECTION XIII - DISPOSAL CONSIDERATIONS

EPA Hazardous Waste Number NONE

WASTE DISPOSAL METHOD:

Product must be disposed of properly under Federal and State regulations for industrial wastes.
Recommended disposal is to incinerate material absorbed on cellulosic absorbent.
As delivered, this product when spilled, released or disposed of, is a non-hazardous waste as defined in RCRA regulation 40 CFR Part 261.

SECTION XIV - TRANSPORT INFORMATION

UN Number	NONE
UN Pack Group	NA
UN Class	NA
Emergency Storage	NA
MFAG Table Number	NA
Kemmler Code	NA
ICAO/IATA Class	NONE
IMDG Class	NONE
Shipping Name	MIRROR GRIND 5448
ADR/RID Class	NONE
ADR/RID Item Number	NA
DOT Hazard Class	NOT HAZARDOUS
Technical Name	

CANADIAN TDG/WHMIS INFORMATION:

PIN NUMBER: None

TDG: NA

TDG ACT CLASS: NA

WHMIS: D2B

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OTHER NAMES: None

SECTION XV - REGULATORY INFORMATION

EEC Classification Irritant

This product as delivered is not regulated as a hazardous substance.

SECTION XVI - OTHER INFORMATION

ADDITIONAL PRECAUTIONS AND NOTES:

PLEASE NOTE! DO NOT MIX with other materials unless advised by supplier.

PLEASE NOTE! This product contains alkanolamines. DO NOT ADD solutions containing NITRITES or related NITROSATING agents to this material. Potential carcinogenic NITROSAMINES may be formed.

VOC INFORMATION

A Certified Product Data Sheet (CPDS) as outlined under Title 40 Part 63, Subpart JJ, Section 63.801 Definitions, detailing VOC content, will be available upon request from Associated Chemists Inc. Environmental Department.